

**FILED**

June 11, 2020

**Kellerhals Ferguson Kroblin PLLC**

**TAMARA CHARLES**  
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June 11, 2020

**Via Electronic Mail**

Hon. Carolyn P. Hermon-Percell  
Superior Court of the Virgin Islands  
Alexander A. Farrelly Justice Center  
5400 Veteran's Drive  
St. Thomas, U.S.V.I. 00802

**Re: Estate of Jeffery E. Epstein**  
**Probate No. ST-19-PB 80**  
**Our File # 00324.170.001**

Dear Judge Percell:

As you know, we represent Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffery E. Epstein.

We write in response to Your Honor's Notice of Intent to Appoint Master dated June 3, 2020, which set a deadline of July 31, 2020 for the Co-Executors to object or comment on the Court's proposed appointment of Rosalie Simmonds Ballentine, Esq. as Master. Because the Co-Executors wish to be fully informed in responding to the Court's Notice, and pursuant to Rule 53(b)(1) of the Virgin Islands Rules of Civil Procedure, we respectfully request that the Co-Executors and their counsel be afforded an opportunity to meet with Attorney Ballentine as soon as practicable. Among the topics to be discussed at such a meeting would be Attorney Ballentine's views on performing her contemplated duties in this matter, and her disclosure affidavit pursuant to V.I. R. Civ. P 53(b)(3).

Given the lingering pandemic, the proposed meeting should likely be conducted via teleconference or videoconference, as Attorney Ballentine prefers, on a date and time convenient for her.

Respectfully submitted,



Christopher Allen Kroblin  
Counsel for the Co-Executors